

CJR
10-11-19

KO/CH: USAO#2019R00662

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

RICHARD WHITE,

Defendant.

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GLR-19-0503

CRIMINAL NO.

(Possession with Intent to Distribute
Controlled Substances, 21 U.S.C. § 841;
Possession of a Firearm in Relation to a
Drug Trafficking Crime, 18 U.S.C.
924(c); Possession of a Firearm by a
Prohibited Person, 18 U.S.C. 922(g);
and Forfeiture, 21 U.S.C. § 853)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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INDICTMENT

COUNT ONE

Possession with Intent to Distribute a Controlled Substance

The Grand Jury for the District of Maryland charges that:

On or about May 20, 2019, in the District of Maryland, the defendant,

RICHARD WHITE,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)

21 U.S.C. § 841(b)(1)(C)

COUNT TWO

Possession of a Firearm by a Prohibited Person

The Grand Jury for the District of Maryland further charges that:

On or about May 20, 2019 in the District of Maryland, the defendant,

RICHARD WHITE

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm and ammunition, that is, one Smith and Wesson pistol bearing serial number FXE5350, and did so knowingly.

18 U.S.C. § 922 (g)(1)

COUNT THREE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury for the District of Maryland further charges that:

On or about May 20, 2019 in the District of Maryland, the defendant,

RICHARD WHITE

did knowingly possess a firearm, to wit: one Smith and Wesson pistol bearing serial number FXE5350, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is the offense charged in Count One of this indictment, Possession With Intent to Distribute a Controlled Substance, in violation of Title 21, United States Code, Section 841.

18 U.S.C. § 924(c)

FORFEITURE ALLEGATIONS

The Grand Jury further finds that:

Firearms Forfeiture

2. Pursuant to Title 18, United States Code, Section 924(d), upon conviction of the offenses alleged in Count Two and Count Three of the indictment, the Defendant shall forfeit to the United States of America the firearm involved in the commission of the offense:

- a. 40 caliber Smith & Wesson Pistol Model SD40 Serial Number FXE5350.

18 U.S.C. § 924(d)

18 U.S.C. § 2461

Robert K. Hur /kyo

Robert K. Hur

United States Attorney

SIGNATURE REDACTED

Foreperson

Date: 10/22/19